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February 8, 2016

Hon. Joseph F. Bianco  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

RE: United States v. Phillip A Kenner and Tommy C. Constantine  
Docket Number: 13-607 (JFB)

Dear Judge Bianco:

I am writing to request that the sentencing of the defendant, Philip A. Kenner, presently scheduled for "February 12, 2016 at 1:30 p.m" as indicated on the first page of the presentence report ("PSR"), be adjourned to a date in the latter part of May, 2016. Only recently did I receive the presentence report, incorrectly dated "January 25, 2015", and received by my office via e-mail on January 25, 2016.

Given the content of the PSR, the requested adjournment will allow sufficient time to review and analyze the report with my client and assert the appropriate objections to the Guideline calculation, in addition to addressing the factors enumerated in 18 U.S.C. § 3553(a) by way of my presentence memorandum.

Thank you for Your Honor's consideration of this letter motion to adjourn sentencing.

Very truly yours,

***Richard D. Haley***

RICHARD D. HALEY

cc: AUSA Saritha Komatireddy via ECF filing  
AUSA Diane C. Leonardo-Beckmann via ECF filing  
Joseph R. Conway, Esq. via EFC filing